


IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO, EASTERN DIVISION

UNITED STATES OF AMERICA,	:	Case No.: 1:17-cr-00341
	:	
	:	
Plaintiff,	:	Judge Donald C. Nugent
vs	:	
	:	
ROBERT ROCHE,	:	DEFENDANT'S MOTION
	:	FOR PERMISSION TO
Defendant.	:	TRAVEL
	:	

Now comes the Defendant, Robert Roche, by and through undersigned counsel, Larry W. Zukerman, Esq., respectfully moves this Honorable Court for permission to travel to Reading, Pennsylvania on Friday, May 11, 2018 and return to Cleveland, Ohio on Monday, May 14, 2018 as fully detailed in the brief in support.


LARRY W. ZUKERMAN, Esq.
Reg. No. 0029498
S. MICHAEL LEAR, Esq.
Reg. No. 0041544
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Counsel for Robert Roche

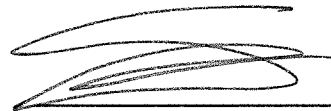
BRIEF IN SUPPORT

The Defendant, Robert Roche, respectfully requests permission to travel to Reading, Pennsylvania to attend the graduation of his son, Jeremiah LoCascio, on Saturday, May 12, 2018 located at Alvernia University, 700 Penn Street; Reading, Pennsylvania 19602. Mr. Roche would be traveling by car and will be able to provide an exact itinerary if requested by this Honorable Court. (Please see Mr. Roche's ticket to the Commencement Ceremony attached hereto as Exhibit A.)

Defendant respectfully requests that this Honorable Court allow him to travel to Reading, Pennsylvania. Undersigned counsel makes this request only in the interest of justice.

WHEREFORE, the Defendant, Robert Roche, by and through his undersigned counsel, Larry W. Zukerman, Esq., and S. Michael Lear, Esq., and respectfully moves this Honorable Court for permission to travel to Reading, Pennsylvania on Friday, May 11, 2018 and return to Cleveland, Ohio on Monday, May 14, 2018 as fully detailed in the brief in support.

Respectfully submitted,


A handwritten signature in black ink, appearing to read 'Larry W. Zukerman', written over a horizontal line.

LARRY W. ZUKERMAN, Esq.
S. MICHAEL LEAR, Esq.
Counsel for Robert Roche

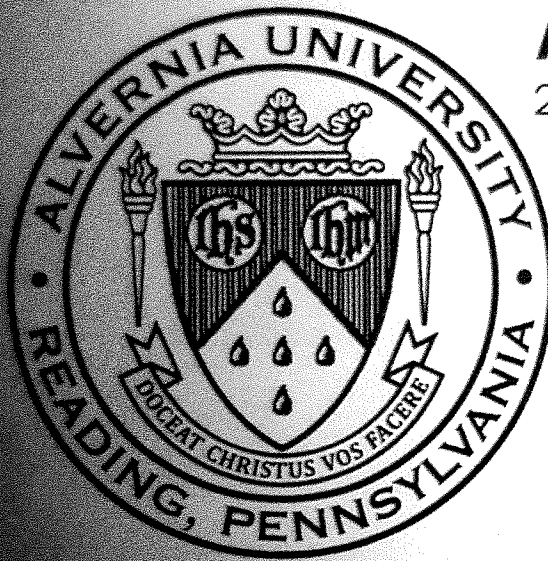
CERTIFICATE OF SERVICE

I hereby certify that a true copy of the forgoing was caused to be electronically delivered through this Honorable Court's e-filing system on this 7 day of May, 2018 to the following:

Robert J. Patton, Esq.
Assistant Federal Public Defender
Office of the Federal Public Defender
1660 West Second Street, Suite 750
Cleveland, OH 44113



LARRY W. ZUKERMAN, Esq.
S. MICHAEL LEAR, Esq.
Counsel for Robert Roche



Alvernia University

2018 Commencement Ceremony

Saturday, May 12, 2018

Doors open at 1:00pm

Ceremony begins at 2:00pm

Santander Arena

700 Penn Street; Reading, PA 19602

EXHIBIT

A

tabbles